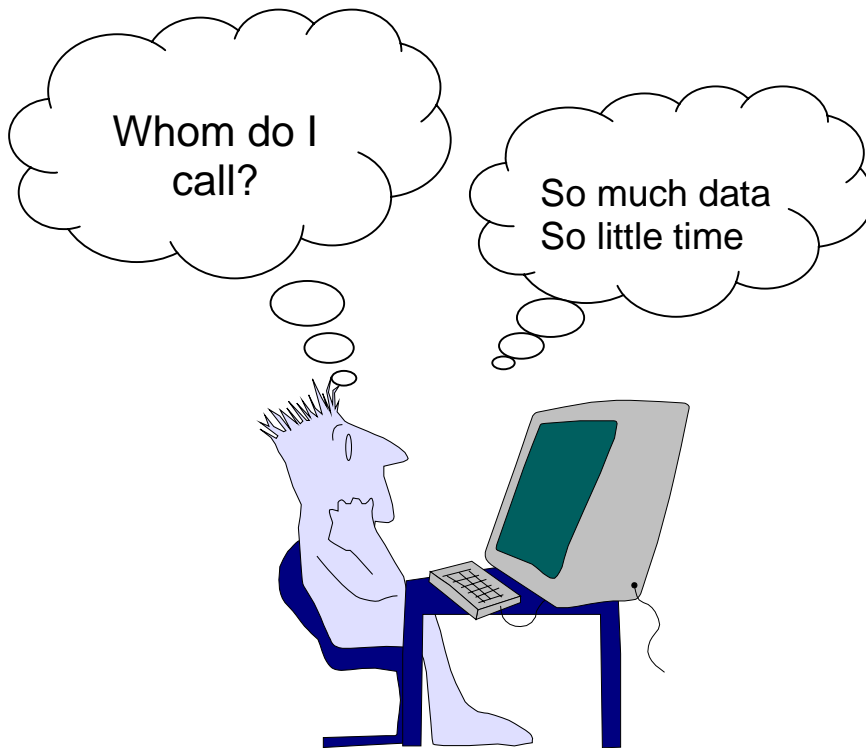


# Trade Compliance Tools

## Automated Tools and Other Resources



## A Resource Guide for Measuring and Improving Compliance

Version 2.0  
Prepared by Office of Strategic Trade  
July 1999

# GETTING STARTED

“Trade Compliance Tools -- Automated Tools and Other Resources” is presented as a resource for measuring and improving compliance. Several new tools, products and processes have been introduced recently, enhancing our capability to manage and improve trade compliance efficiently. This guide will help you select and use the right tool.

This research guide can steer you through the process of gathering data and information about Trade Compliance issues. It includes information on Contacts for PFIs, Customs Automated Trade Tools, Trade Compliance programs and the Risk Management Process. Use this guide like an index – a place to turn to when you are looking for information. While it does not include all reports, user manuals or Standard Operating Procedures, it does let you know where you can find that information.

The document is structured as a series of topics that will lead you to the various resources. Feel free to skip around the document following the links between them. In the Infobase or Intranet edition of this document, the links will take you directly from one page to another. If you are using the printed copy, the underlined link will be the same as the title line of the desired section. In some cases, you will be referred to the current Infobase for more extensive reference documents that have been published there.








We hope that this guide will be useful in your efforts to 1) identify and find the root causes of non-compliance, 2) assess and analyze the issue, 3) develop action plans to maximize trade compliance, and 4) track and verify that the plans are working. If you have any questions as you use this guide, please feel free to contact any of the Office of Strategic Trade contacts listed inside. If you have any suggestions for changes to make this guide easier to use, please contact [Deleted for RFP](#).

## IMPORTANT NOTE

To ensure that you have access to the latest information, please rely on the Infobase or Intranet version for the most up-to-date list of tools, contact names and telephone numbers.

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# Risk Management Process Overview

## What is Risk Management?

As global trade continues to grow dramatically, Customs officers perform their duties in an environment where decisions regarding the allocation of finite resources become increasingly important. How do we decide what to examine? Do we want to use our finite resources to perform limited reviews on 100 percent of imports, or would it be more effective to perform extensive, thorough reviews on a smaller percentage of higher risk imports? Do we assume that all importers, and therefore all importations, are somehow deficient and result in a loss of revenue or present a threat to the government and public? Do we accept, based on our own experiences, that some importers and some imports present a much more significant risk than others? What shipments present the greatest risk for non-compliance with trade laws?

We define risk as *the degree of exposure to the chance of non-compliance, which would result in loss to the trade, industry, or the public*. Risk management is the integrated process for identifying and managing risk in trade compliance. Customs acknowledges that not all importers present the same level of risk for non-compliance. Many importers have a record of complying with import laws and do not present a risk that justifies a significant allocation of resources. We already use risk management techniques such as Compliance Measurement, Compliance Assessment, and Cargo Selectivity to assist us in making exam decisions for imports.

The key to Risk Management is to gather and analyze all relevant data efficiently and effectively and use this data to make decisions about allocating resources. Risk Management is a method of managing by identifying and controlling those events that have the potential to cause significant problems. In Customs trade terms, that means identifying those imports that represent the greatest risk of non-compliance, so that we can focus our resources in those areas.

## What are the Risk Management Process Steps?

The U.S. Customs Risk Management Process for trade consists of four essential steps:

1. Collect Data and Information
2. Analyze and Assess Risk
3. Prescribe Action
4. Track and Report

Established programs such as Account Management, Compliance Measurement, Compliance Assessment, and Enforcement Evaluation Teams are critical components of Customs risk management. However, to be most effective, the Customs Risk Management Process must be formal, systematic, and applied in a disciplined manner. Each person involved in the importation of goods into the commerce of the United States is part of the Customs Risk Management Process.

## **Step 1 - Collect Data and Information**

Proper risk management requires a systematic approach to collecting data. The following questions should be answered in this step: Are collection methods statistically valid? What can we learn from past experience? Risks cannot be assessed or managed until data is collected and the risks can be identified and described.

Compliance Measurement is an important tool at this stage of the process. Customs allocates a portion of its resources available for cargo examinations and document reviews for this statistically based program. This statistical sampling methodology allows Customs to estimate the compliance level of all importations, dramatically increasing the value of the information collected from such resource deployment.

Suggested Automated Trade tools for this step: Customs Automated Port Profile System (CAPPS), the Account Activity Tool (AAT), the Numerical Integrated Profiling System (NIPS), National/Local Selectivity, the Laboratory Information Management System (LIMS) and the Entry Summary Findings Analysis System (ESFAS).

## **Step 2 - Analyze and Assess Risk**

The next step is to analyze the data and determine the likelihood of non-compliance. Customs knows that the majority of imports entering the country are compliant. Customs also knows the compliance rate for various industries, specific commodities, and certain importers. Analyzing historical data and trends, and applying definitions of significance and materiality, allows Customs to narrow its focus on the areas of greatest potential risk.

The key components of Customs risk analysis and assessment are the highly specialized knowledge and experience of its employees, Compliance Risk Categories, Enforce Impact Levels, Compliance Measurement Significance Definitions, and Compliance Assessment Materiality.

Suggested Automated Tools for this step: Customs Automated Port Profile System (CAPPS), the Trend Analysis and Analytical Selectivity Program (TAP), the Account Activity Tool (AAT), and the Macro Analysis Trade System (MATS).

### **Step 3 - Prescribe Action**

Once a potential risk has been identified and analyzed, it is time to design the appropriate action and dedicate necessary resources to address that risk. This step requires two distinct actions:

1. identifying the cause of the risk, such as complex trade laws, an importer's lack of knowledge, or willful disregard for importing laws; and
2. designing an action plan and assigning resources to address that risk.

Involvement of skilled personnel and managers who control the resources is crucial here. A wide selection of tools addressing specific causes of non-compliance is also advantageous. The primary components of this step are informed compliance and enforced compliance.

Suggested Automated tool for this step: Issue Management System (IMS)

### **Step 4 - Track and Report**

Once the appropriate action is designed, ownership for that action must be assigned. The results must be tracked and fed back into the Risk Management Process. It is critical to the cycle of identifying and eliminating future risk that actions are implemented and results are reported.

Enforcement Evaluation Teams (EETs), the Strategic Planning Board (SPB), and Account Managers ensure that responsibility is assigned and accepted for all actions. EETs and the SPB meet regularly to track the progress of local and national actions. Compliance Assessment Teams (CATs) conduct follow-up verifications with companies to ensure compliance improvement plans are effectively implemented and Account Managers meet regularly with their accounts to ensure implementation of account action plans and track compliance progress.

Suggested automated tools for this step: Customs Automated Port Profile System (CAPPS), the Issue Management System (IMS), and the Laboratory Information Management System (LIMS).

### **Continuous Risk Management**

To be most effective, Customs Risk Management Process must be formal, systematic, and applied in a disciplined manner. Since risk is never absolutely known, and because risk can change over time, results and experience must be fed back into the process to narrow the knowledge gap and better predict future risk. Managing risk means that decisions are data-driven and that the quality of those decisions is contingent on the quality of the data input.

## For More Information on the Risk Management Process

A full document on the Trade Compliance Risk Management Process can be found on Infobase under Trade Management. For a quick table of the automated tools and the Risk Management Process steps, see Risk Management Tools.

## Risk Management Tools

How can we use automated trade tools to manage our risks in the trade compliance process?

The following matrix relates the steps of the Risk Management Process to the automated trade tools that can be useful for each step.

<b>Risk Management Step</b>	<b>Suggested Tools</b>
Collect Data and Information - Identify your most serious compliance problems	Customs Automated Port Profile System (CAPPS) Account Activity Tool (AAT) Numerical Integrated Profiling System (NIPS) National/Local Cargo Selectivity Entry Summary Selectivity Drawback Selectivity Export Selectivity Laboratory Information Management System (LIMS) Entry Summary Findings Analysis System (ESFAS)
Assess & Analyze	Trend Analysis and Analytical Selectivity Program (TAP) Macro Analysis and Trending System (MATS) CAPPS AAT
Prescribe Action – Determine if similar actions have already been taken, document the plan and results	Issue Management System (IMS)
Track and Follow-up - Determine if action produces desired results	IMS CAPPS LIMS

## Automated Trade Tools

The right tool can help you get to the data you need.

The U.S. Customs Service currently has the world's largest collection of trade data in the world. In order to access that storehouse of data in an orderly fashion, a number of automated trade tools have been created that simplify the task of wading through literally billions of data elements. Some of these tools are familiar to most of the Customs Service, some have specialized applications, and some are very new with limited accessibility.

What kinds of data are you looking for?

The key to using any tool is to understand what kind of data the tool can provide and what kinds of questions are best addressed by that data. For example, for Compliance Data by ports, Accounts, HTS numbers or other key sorts, CAPPS is the place to go. The informed tool user should know the capabilities of the selected tool and should consult the user manuals, where available, for further details.

Find the desired data and the tool name will direct you to the tool information.

Desired Data	Tools to Use to Obtain Data			
Compliance Rate Data	CAPPS			
Other Importer Compliance Data	ESFAS			
Importer Data	AAT	TAP	MATS	Account Selection Database
Exporter Data	TAP	MATS	NAFTA Database	
Port Compliance Data	CAPPS			
MID Compliance Data	CAPPS			
Intervention/Analysis/Profile Data	IMS			
Laboratory Data	LIMS			
Imports by CO	TAP		MATS	
Illegal Activities Trends	NIPS			



# CAPPS

## Customs Automated Port Profile System

CAPPS is a report-generating system that allows users to retrieve compliance statistics related to commercial shipments entering the commerce of the United States. The statistics include compliance rates, discrepancy rates, estimated discrepancies, estimated populations, counts of discrepancies found as a result of CM and non-CM targeting, non-examination discrepancies, and estimated revenue gaps. These statistics can be obtained for entities, such as, consignee, filer, manufacturer, importer, HTS (2-digit and 4-digit level), country of origin, or primary focus industries. CAPPS can generate reports based on data for national, CMC, service ports, area ports, and for established or user-created area groups. Reports can be generated for the fiscal years, 1996 through 1998, and 1999 to date. The CAPPS database is updated on a monthly basis.

Feature/Question	CAPPS
What does it do?	Provides reports on compliance rates for commercial shipments entering the United States. In addition, it provides discrepancy rates for imported merchandise that is examined as a result of non-CM targets. This information allows Customs Officers to assess the effectiveness of their cargo exam targets, while also identifying areas of risk, so that they can focus their resources in areas that will improve the Trade's compliance with importing laws and regulations.
Which office developed and maintains it?	Office of Strategic Trade
Type of Product?	16 Bit Data Warehouse on CD-ROM
Where do I find it?	HQ, the STCs, Regulatory Audit offices, OI, CMCs and Ports.
System Requirements	Windows NT, 95 or 3.1
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	YES and a User Guide is available on Infobase
Whom do I contact ?	cc:Mail to OST Automation Support

# MATS



## Macro Analysis and Trending System

MATS can be used to create profiles based on ACS import, Census import and Census export data for national, port or team levels. These profiles can be analyzed graphically over time at yearly, quarterly or monthly time intervals. Some of the items that can be profiled are tariffs at the 10-8-6-4 digit levels, anti-dumping case numbers, import broker codes or names, consignee names or numbers, countervailing case numbers, countries of export, countries of origin, commodity specialist teams, entry types, manufacturer names or numbers and visa category numbers. Some of the values that can be associated with a profile include average unit value, average unit weight, anti-dumping duty, countervailing duty, duty, gross weight, line count, line value and net quantity. Data dating from January 1994 to present is used and is refreshed monthly.

Feature/Question	MATS
What does it do?	MATS provides the user an ability to easily retrieve data for the analysis of trends and profile areas for 19 data elements such as HTS, AD/CVD case numbers, consignees, and importers through a graphical representation of the data.
Which office developed and maintains it?	A joint effort between the Office of Strategic Trade and the Office of Information and Technology
Type of Product?	Client Server system utilizing ACS, Census Import, and Census Export Data
Where do I find it?	HQ, STCs, and Ports connected to the WAN
System Requirements	Windows NT, WAN Connection.
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	YES
Whom do I contact for more information?	cc:Mail to OST Automation Support

# TAP



## Trend Analysis and Analytical Selectivity Program

TAP can be used to create profiles based on ACS data for national, port or team levels. These profiles can be analyzed graphically over time at yearly, quarterly or monthly time intervals. Some of the items that can be profiled are tariffs at the 10-8-6-4 digit levels, anti-dumping case numbers, broker codes or names, consignee names or numbers, countervailing case numbers, countries of export, countries of origin, commodity specialist teams, entry types, manufacturer names or numbers and visa category number. Some of the values that can be associated with a profile include average unit value, average unit weight, anti-dumping duty, countervailing duty, duty, gross weight, line count, line value and net quantity. Data from January 1994 to present is used and is refreshed monthly.

Feature/Question	TAP
What does it do?	TAP provides the user an ability to analyze trends and profile areas for HTS, AD/CVD, Trade Agreements, consignees, and more using ACS data. TAP allows users to zero in on items such as tariffs and consignees to look at what entry summary lines match the user's criteria, showing associated risk scores for each line when applicable.
Which office developed and maintains it?	A joint effort by the Office of Strategic Trade, the Office of Field Operations, and the Office of Information Technology
Type of Product?	Client Server system utilizing ACS Data
Where do I find it?	HQ, the STCs, Regulatory Audit offices and Ports connected to the WAN.
System Requirements	Windows NT, WAN Connection.
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	YES
Does it have Online Help?	NO
Whom do I contact for more information?	cc:Mail to OST Automation Support

# IMS

## Issue Management System

The IMS is a database used to record, manage, and monitor the main workload of OST. Using a point-and-click interface, users at the STCs and HQ are able to create, maintain, and query records to find information on OST issues, activities and assignments, both past and present. Each individual record provides a snapshot of the status of an issue, describing what the issue is, when it was worked, what kind of work was done, as well as any conclusions or results. Important documents drafted in Word format can be saved directly into the database, creating a permanent archive of work products. Records with similar profiles (such as the same importer IDs, port codes, or tariff numbers) can be selected by filters for individual review or group analysis, and a number of helpful reports can be run.

Feature/Question	IMS
What does it do?	Provides a central database for tracking the issues and activities involving OST. Information can be sorted and queried as needed, and each record provides an instant and complete overview of the details for any given issue.
Which office developed and maintains it?	Office of Strategic Trade
Type of Product?	Windows NT based, sharable database integrated via WAN.
Where do I find it?	HQ and the STCs connected to the WAN. Stand-alone operation not possible.
System Requirements	Windows NT, Office 97, WAN Connection.
Can it support data analysis by teams?	No
Can it support data analysis by Port?	Yes
Can it support National data analysis?	Yes
Can it be used for Risk Analysis?	Yes
Does it contain anomaly alerts?	No
Does it have Online Help?	Online Help is available in the form of "help records", and a detailed user guide is available on Infobase.
Whom do I contact for more information?	<a href="#">Deleted for RFP.</a>

## AAT

### Account Activity Tool

The AAT provides users with an importing account's ACS entry data for the current plus the two preceding fiscal years. Entry data can be displayed as individual transactions or summarized according to selected data elements, e.g., country of origin, manufacture, SPI, and 4 or 6 digit tariff number - by volume, value and duty. There are also reports on drawbacks, liquidations, non-liquidations, ABI statistics, as well as others too numerous to list here.

The individual transaction display enables the review of specific incidences of non-compliance while the summarized data focuses on import activity. AAT allows the user to view account data for compliance measurement and non-compliance exams.

The data is distributed on CD-ROM to National and Port Account Managers for use in managing assigned accounts. It is viewable via a graphical user interface (GUI), allowing analysts to use pre-programmed queries to automatically report data needed in either spreadsheet or report format. Date ranges are easy to set to make comparison studies. Analysts can also develop individualized queries for use against the AAT's database to customize analysis. The AAT is also being distributed to companies that have made "Freedom of Information Act" requests so that they can review their import activity and to evaluate their efforts to improve compliance. Because all of the account data is present on the CD-ROM, the data is always immediately available to the user.

Feature/Question	AAT
What does it do?	<p>Provides the user with multiple years of entry data related to a specific account. Included in this tool is the ability to view entry release and entry summary transactions along with all related files. The AAT also allows the user to view account data for compliance measurement and non-compliance exams.</p> <p>The AAT is importer/consignee based. It provides a complete view of the account including line item entries, examinations, and other related ACS files.</p>
Which office developed and maintains it?	Office of Strategic Trade
Type of Product?	CD-ROM format
Where do I find it?	HQ-ADD distribution of CD-ROMs to National and Port Account Managers, CATs and companies submitting FOIA requests.

Feature/Question	AAT
System Requirements	Windows 3.1, NT
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	Yes by 11/99, and a User Guide is also available on Infobase
Whom do I contact for more information?	cc:Mail to OST Automation Support

## NIPS



### Numerical Integrated Profiling System

NIPS uses data “chunks” downloaded from ACS to the specifications of an individual analysis. For example, if a request is made for a NIPS data set for a specific importer, all 7501 import data connected to that importer will be downloaded by Trade Information Development Exchange (TIDE) and transmitted to the user. The NIPS software provides the means for the user to analyze this data by commodity, importer, port, manufacturer, country of origin, visa-category and broker, in any desired order. NIPS can also be used for 3461, export, and Bank Secrecy Act data. Additional results with NIPS include a unit price analysis, a sum graph display, anti-dumping analysis, bill of lading information, year totals, and past ISL discrepancy information.

Feature/Question	NIPS
What does it do?	Provides a graphical interface for Automated Commercial System (ACS) data. NIPS allows the user to identify trends and anomalies in import data which may be indicative of illegal activities. These trends are not limited by port. Analyses can be done by commodity, importer, manufacturer, country of origin, port of entry, visa-category and broker. NIPS also allows for

Feature/Question	NIPS
	comparison of 7501, 3461, Bank Secrecy Act data and Export Data.
Which office developed and maintains it?	Office of Intelligence Trade Intelligence Development Exchange (Tide)
Type of Product?	Stand alone
Where do I find it?	Software on 3.5"disks is currently available upon request from the <a href="#">Deleted for RFP</a> . Alternatively, the software can be downloaded from the mainframe at "Infocenter"- MainPCXfer. Data sets for NIPS must be requested through the TIDE office.
System Requirements	NIPS is compatible with Windows NT and Windows 3.1
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	Yes, pressing the F1 key can access NIPS on-line help.
Whom do I contact for more information?	<a href="#">Deleted for RFP</a> .

## Account Selection Database

Customs account management strategy includes selecting accounts whose import volume, Primary Focus Industry (PFI) activity, and compliance history represent the most risk to Customs. Customs developed a 25 point scoring system to help identify the risk in a quantifiable way. The five categories used in the account selection tool are Company Rank, Number of Line Items, PFI Percent, PFI Industry Ranking and Compliance Rate. Total scores are determined by the sum of the scores in the five categories and are weighted. The risk scores are captured in the Account Selection Database and are available to all ports.

Feature/Question	Account Selection Tool
What does it do?	Presents calculated risk scores for accounts based on company rank, import volume, PFI activity and compliance history.
Which office developed and maintains it?	Office of Strategic Trade
Type of Product?	Stand alone
Where do I find it?	Software is currently available upon request from the Office of Strategic Trade.
System Requirements	Compatible with Windows NT and Windows 3.1
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support national data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Whom do I contact for more information?	<a href="#">Deleted for RFP.</a>



## NAFTA Database



The NAFTA Database contains information on NAFTA claims reviewed by U.S. Customs. This includes verifications and determinations, denials based on the absence of a valid Certificate of Origin and compliance measurement hits that do not fit these parameters, e.g., Textile Preference Levels (TPLs), repairs and duplicates. Because NAFTA is exporter oriented, most of the information contained in the Database is not available elsewhere. A search feature allows the Database to be queried by company name, manufacturer's ID or entry number. Programmed reports on the NAFTA compliance measurement sub-plan are also included.

Feature/Question	NAFTA
What does it do?	Provides information on NAFTA claims reviewed by U.S. Customs including: the exporter and producer, rule of origin, blanket Certificate dates, tariff numbers, and findings.
Which office developed and maintains it?	North Star Commercial (NSCOM), Office of Field Operations
Type of Product?	Stand alone
Where do I find it?	Send a cc:Mail to <a href="#">Deleted for RFP</a> to get on the distribution list. The database is updated monthly.
System Requirements	NAFTA Database is compatible with Windows NT and Windows 3.1
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	YES
Whom do I contact for more information?	<a href="#">Deleted for RFP.</a>

## ESFAS

### Entry Summary Findings Analysis System

The Entry Summary Findings Analysis System (ESFAS) is an Access-based tool that contains tables and queries, which allows users to generate information related to summary reviews and discrepant findings. The tables provide line item information for all summary lines in which compliant or discrepant findings have been recorded into ACS. Included along with basic line item information, such as, HTS, value, quantity, duties paid, etc., is discrepancy information, and related selectivity results. The queries allow users to generate reports on the number of non-CM "Significant Reviews" and discrepant findings. These queries can be produced for entities, such as, filer, consignee, importer, PFI category, review team, HTS, and country of origin. The queries can be generated for a specific Service port, Area port, or for National totals. The database contains data for FY1998 and FY1999. Beginning in June 1999, this database will be updated on a monthly basis.

Feature/Question	ESFAS
What does it do?	Enables the production of reports on Entry Summary targeting effectiveness. Used in conjunction with CAPPS for collecting compliance rates, the Entry Summary Findings Analysis System assists Customs Officers to identify risk areas so that they can focus their resources on areas that will improve the Trade's compliance with importing laws and regulations.
Which office developed and maintains it?	Office of Strategic Trade
Type of Product?	Access (Version 2.0) Database on CD-ROM
Where do I find it?	HQ, the STCs, CMCs, and Ports.
System Requirements	Windows NT, 95 or 3.1
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	NO
Whom do I contact for more information?	cc:Mail to OST Automation Support

# LIMS

## Laboratory Information Measurement System

All samples and technical questions that are sent into Laboratories and Scientific Services for resolution are assigned a LIMS number and a report is issued under that number regarding the analysis of the issue or sample. Reports can be queried using a number of parameters connected with the case, entry number, and case file numbers.

Feature/Question	LIMS
What does it do?	Provides a ready reference for officers to pull up laboratory reports on samples and issues. The reports can be queried in a number of ways including entry number, case number, importer, exporter, and HTS numbers.
Which office developed and maintains it?	Laboratories and Scientific Services
Type of Product?	ACS Based
Where do I find it?	Found on ACS by using the "LIMS" module
System Requirements	Same as any other ACS based system
Can it support data analysis by teams?	YES
Can it support data analysis by Port?	YES
Can it support National data analysis?	YES
Can it be used for Risk Analysis?	YES
Does it contain anomaly alerts?	NO
Does it have Online Help?	NO, Help can be obtained by calling <a href="#">Deleted for RFP</a>
Whom do I contact for more information?	<a href="#">Deleted for RFP.</a>

## Contacts for Industries/Trade Agreements/Trade Issues ■

How do I get information about an industry, trade agreement or issue?

As part of your analysis of trade compliance in your port, you may want to see a detailed analysis of a particular industry, trade agreement or trade issue. Requests for information can be coordinated via telephone or cc:Mail with the International Trade Manager (ITM) at the Strategic Trade Centers.

To make it easier to decide whom to call, the contact table is broken down into three segments:

- Contacts for Primary Focus Industries
- Contacts for Trade Agreements
- Contacts for Non-PFI Industries or Other Trade Issues

## Contacts for Primary Focus Industry Issues ■

Which STC can answer my PFI questions?

On October 1, 1998, the Office of Strategic Trade (OST) redistributed the assignment of PFIs to the Strategic Trade Centers (STC). OST made these changes to balance the workload and provide better service to Port activities for PFI Trade Compliance. The following list provides the PFI, STC and Contact Person and is current to June 1999. For the most up-to-date listing, please check the Customs Infobase. Click on *Strategic Trade Management* and then the *OST Contact List*.

PFI or Trade Issue	STC	Contact	Phone
Agriculture	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Auto/Auto Parts	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Communications	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Critical Components-	Deleted for	Deleted for RFP.	Deleted for RFP.

PFI or Trade Issue	STC	Contact	Phone
Bearings	RFP.		
Critical Components-Fasteners	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Footwear	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Production Equipment	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Steel – Flat Products	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Steel – Shapes	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Textiles	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.
Wearing Apparel	Deleted for RFP.	Deleted for RFP.	Deleted for RFP.

## Contacts for Trade Agreements ■

Which STC handles NAFTA Questions? What about other Trade Agreements?

The North American Free Trade Agreement (NAFTA) affects significant portions of the imports of almost all of the PFIs. Therefore, if the NAFTA question is PFI related, call the PFI contact person at the STC listed in the Contacts for PFIs Table. If it is a general NAFTA question, contact [Deleted for RFP.](#)

## Contacts for Non-PFI Industries or Other Trade Issues ■







Which STC has the information about Non-PFI industries or Other Trade Issues?

For a question on a PFI Anti-Dumping and Countervailing Duties (AD/CVD) case or issue, call the STC for that specific PFI listed in the Contacts for PFIs. If the issue is in a non-PFI AD/CVD commodity, call [Deleted for RFP.](#) For other trade issues, refer to the following table.

Trade Issue	STC	Contact	Phone
Foreign Trade Zones	Deleted for RFP	Deleted for RFP	Deleted for RFP
Intellectual Property Rights	Deleted for RFP	Deleted for RFP	Deleted for RFP
Chemicals/Pharmaceuticals (Watch List)	Deleted for RFP	Deleted for RFP	Deleted for RFP
Mass Merchandise (Watch List)	Deleted for RFP	Deleted for RFP	Deleted for RFP
Petroleum (Watch List)	Deleted for RFP	Deleted for RFP	Deleted for RFP
Non-PFI Commodities	Deleted for RFP	Deleted for RFP	Deleted for RFP
Revenue	Deleted for RFP	Deleted for RFP	Deleted for RFP

## Programs for Trade Compliance

Customs has a variety of programs that aim to improve trade compliance through specific types of Customs/ Importer/Broker interactions.

-  MARC2000
-  Focus Ports on Non-Compliance
-  Compliance Assessments (CA)
-  Importer Compliance Monitoring Program (ICMP)
-  Account Management
-  National Selectivity/National Compliance Measurement

## MARC 2000

What is MARC 2000 and where can I get more information about it?

MARC 2000 is the Multiport Approach to Raise Compliance by the year 2000 project. It emanated from the 1996/1997 Increase Compliance Project where 12 ports devised plans to increase local port compliance in a particular area. These ports identified and targeted specific areas that contributed to low compliance in their ports and implemented strategies to raise compliance. MARC 2000 is the next evolution of this original project where multiple ports who share the same compliance issues, come together to formulate a national plan aimed at raising compliance in a specific area. In this effort, Customs Management Centers and Strategic Trade Centers have cooperatively joined the primary ports to devise a national plan. Primary and secondary ports are then asked to devise local activities based on the national plan. Ports with smaller volumes are also asked to follow the national plan in their regular course of business with the identified commodities.

Everyone has a role on the team. The Strategic Trade Center provides the data for analysis as well as global industry information. The Strategic Operational Analysis Staff (SOAS) establishes Compliance Measurement or Selectivity criteria, estimates and monitors impact on the field, ensures the proper negotiation of specific accounts, and reports results. The ports and National Import Specialist analyze the industry data and bring product knowledge and industry expertise to the team. The Office of Investigations and Enforce Evaluation Teams address fraud and continued non-compliance through a determined course of action, and the laboratories provide scientific and testing assistance. The Customs Management Center organizes port efforts and monitors the overall plan. This program hopes to raise overall compliance, promote uniformity, and inform the trade. The first six projects are Production Equipment, Bearings, Gloves, Whole Autos, Revenue, and Express Consignment Operations. All of the plans have incorporated an outreach component as an integral part of the plan, but each is tailored specifically for the industry based on non-compliance issues and concerns.

Questions should be directed to the Strategic Trade Center responsible for the Primary Focus Industry covered or [Deleted for RFP](#).

## Focus Ports on Non-Compliance

What is this program and where can I get more information?

Focus Ports on Non-Compliance is a joint OFO/OST effort to improve Trade Compliance through port empowerment. It involves taking the CAPPS data down to

the port level and using it within the Risk Management Process to determine where port trade attention should be focused. Application of the concepts embraced by this program can lead to more effective utilization of cargo exams, improved targeting of non-compliant entries, and better facilitation of compliant trade.

In addition to exposing first line supervisors and front line officers to the basics of Risk Management (Collecting Data, Analyzing and Assessing Risk, Prescribing Action, Tracking and Reporting), the principles of trade analysis are introduced. Terms and techniques such as “Risk v. Resources”, “Eye On Compliance Matrix” and the new Trade Compliance Measures (Compliance, Targeting, Verification, Apprehension, and Inconvenience Rates) are demonstrated and explained for practical application at the port level.

Finally, SOAS provides the ports with detailed briefings regarding the accuracy of exam and entry findings input (Data Stewardship), targeting effectiveness and various account related enforcement and facilitation initiatives in Compliance Measurement and Selectivity.

For more information, please contact [Deleted for RFP](#).

## Compliance Assessments

### Where Can I find information on Compliance Assessments?

Quarterly Compliance Assessment status reports are issued to Customs Port Directors. These status reports include completed and in-progress Compliance Assessments. If you need a copy, please contact your Port Director. If you require information about a specific Compliance Assessment, contact the Regulatory Audit office listed on the report. The contacts for each office are listed on the following table.

Audit Field Office	Audit Field Director	Phone
Boston, MA	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
New York, NY	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
Chicago, IL	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
Detroit, MI	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>



Audit Field Office	Audit Field Director	Phone
Plantation, FL	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
Ft. Mitchell, KY	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
Houston, TX	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
Long Beach, CA	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
San Francisco, CA	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>
Washington, DC – HQ	<a href="#">Deleted for RFP</a>	<a href="#">Deleted for RFP</a>

## Integration of Compliance Assessment Results with CM Sampling and Selectivity

The SOAS is responsible for applying the results of completed Compliance Assessments to the Compliance Measurement and Selectivity programs, ensuring that these programs are coordinated. If you require information about the Compliance Measurement or Selectivity status or exam level of a specific account, contact the [Deleted for RFP](#).

## ICMP Importer Compliance Monitoring Program

The ICMP allows an importer to implement a Customs structured review to assess its import compliance on a voluntary basis. This program, conducted by the importer and verified by Customs, follows the concepts of a Compliance Assessment. However, the ICMP gives the importer the ability to stage the various required compliance tests over a period of up to three years.

The ICMP does not signal a change in Customs attitude towards the importance of oversight. Rather the program will be utilized by those importers who are willing to set a positive course for their importing activities by building effective systems that produce compliant Customs transactions. Some benefits derived for those participating in the program are:

- Better knowledge of their import operations and obligations under the MOD Act and U.S. law,
- Certainty of duty costs,
- Less government intrusiveness,

- Reduced cargo/entry summary examinations for those who demonstrate compliance.

## Guidelines for Participation

To participate in this program Customs does not require any company to have undergone a Customs Compliance Assessment. Each year there will be an open season, during the month of January, for those wanting to participate. Customs will notify those accepted into the program no later than the first of March. A consultation Customs and the participant is held at the earliest agreeable date.

## Consultation with Customs

After being selected for this program, the company is required to consult with the Customs Service about the program's requirements. This is necessary to ensure that all parties have a mutual understanding of the company's business practices and their corresponding relationship to this program. These consultations are not designed to increase Customs oversight. Additionally, they are to take place at the beginning of each new business year.

## Independent Testing

Ideally, a group independent of the importing function should conduct the work associated with ICMP. Should an importer find that achieving this independence is not feasible, individuals responsible for the company's import function may conduct the program. Utilization of outside professionals (Customhouse brokers, accounting/law firms or other qualified independent practitioners) is not required by Customs, but is at the discretion of the importer.

## Who to contact for more information?

Questions concerning participants in this program can be directed to [Deleted for RFP](#).

## Account Management

### What is Account Management?

Account Management is Customs process of viewing a company and its trade performance in the aggregate, not by each transaction. The goal of Account Management is to increase compliance by the company.

Account Management includes analysis of an account's performance using the Account Selection Database and other trade tools, coordination of the account's activities, identification of its trade compliance problems, and resolution of those problems.

There are two different approaches to Account Management - National Account Managers, and Port Account Teams. Account Managers are Customs employees dedicated full-time to managing accounts. Port Account Teams consist of port employees who work together to manage accounts. The core team members consists of Import Specialists. In many cases, a CST team leader or FNIS provides primary input into the formulation of an account action plan. Other team members may include OAS, Inspectors, and Entry Specialists. The processes for administering national and port accounts are almost identical, with the common goal of increasing compliance.

For more information, contact: [Deleted for RFP](#).

## **National Selectivity / National Compliance Measurement**

The Strategic Operational Analysis Staff (SOAS) in New York is responsible, at the national level, for creating, monitoring, and maintaining the criteria in the various modules of these systems. There are several selectivity modules that can be used by import specialists. These include Cargo, Entry Summary, Drawback, and Export. To access these modules the user would need to use the on-line ACS query for the locate function in the module:

- SSDL - Cargo
- CRTL - Entry Summary
- DMCL - Drawback
- VCDL - Export

Questions concerning these modules, making referrals, etc. should be directed to one of the following: [Deleted for RFP](#).

## Strategic Trade Center Products

What products do the STCs provide to other offices?

Product	Where to find it	Description
Importer Account Profile	STC, RAD CAT leader, IMS	Integral part of the Compliance Assessment Team (CAT). Details the company's import, compliance, and enforcement activity
Exporter Account Profile	STC, RAD JVT leader, IMS	Integral part of the NAFTA Joint Verification Team (JVT). Focuses on specific manufacturer or exporter from Canada or Mexico to the US and their exports claiming NAFTA preferential treatment.
Intervention	IMS	Integrated Customs initiative to attack multi-port trade compliance problems, conducted by, coordinated by, or with support of an STC.
Textile Analysis	Textile Clearing House, IMS	The Textile Clearing House at the New York STC provides a central point for collection, analysis and coordination of textile related information. Using ACS data, various Trade Compliance tools and other approaches, the Clearing House analyzes allegations, monitors compliance, identifies areas of possible transshipment, and supports inquiries from ports, foreign countries, and the United States Trade Representatives (USTR).
Antidumping/ Countervailing Analysis	IMS	Analysis of antidumping/countervailing duty cases for non-compliance, transshipment, value manipulation, misclassification, misdescription, entry type, and port changes.
Early Monitoring Report (EMR)	Excel file collection	The Chicago STC produces this monthly update to steel importations statistics, sent to the steel ports, for early notification of changes in volume, values, and entry types.
Trade Measurement Report	Word Document	The Chicago STC produces the semi-annual analysis of steel, bearings and fastener compliance, highlighting the areas of non-compliance by importer, port,

Product	Where to find it	Description
		brokers, and other key indicators. This report is distributed to the ports.
IPR Seizure Statistics	Excel file	The LA STC compiles the semi-annual IPR statistics including total domestic value, number of seizures, source countries, and top commodities. Statistics are posted to the Customs website. Prior to 1999, the report was compiled annually.

## Strategic Operational Analysis Staff Products

What products does the SOAS provide to other offices?

Product	Where to find it	Description
CM Exception Files	Access Tables	Sent by SOAS to CM Coordinators in the field. Data quality tables used to ensure review of CM findings accuracy.
CM Port Audit Reviews	Excel spreadsheet/ Word Document	Sent by SOAS to Assistant Port Directors and CM Coordinators in the field. It is a detailed line by line audit of possible problems with CM findings.
Trade Compliance Analytical Reviews (TCARS)	Word Document	SOAS analysis of accounts with statistically valid low compliance rates. Sent as part of the Company Enforced Compliance Process (CECP) to the SPB, Enforcement Evaluation Teams, and other offices for vetting and possible enforcement action. SOAS maintains record of the status of CECP activity for subsequent reevaluation.
Compliant Importer Listing	Word Document /Access Table	Current listing of Compliance Assessment compliant accounts and their protected importer numbers. Information is sent to the ports on field exam activity relative to these importers.
NAFTA Tool	CD ROM Visual Basic Application	Distributed by SOAS to all NAFTA coordinators. Current version contains all FY 1998 NAFTA CM information.
Responses to Trade Inquiries on Exam Frequency	Word Document	SOAS researches and prepares responses for HQ and the field regarding trade inquiries on exam frequency related to National CM and Selectivity criteria.

For further information on SOAS products, please contact [Deleted for RFP](#).

## Suggestions



Did you find what you needed?

This document was the collaborative work of many individuals in OST and OFO. We hope that it has proved to be helpful in your search for tools to improve trade compliance.

Do you have any suggestions for improvements in this document?

Please give us your opinions on the Trade Compliance Tools. We would like to be able to keep the electronic versions as current and useful as possible. You can help us by sending your comments by cc:Mail to [Deleted for RFP](#).

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Version 2.0  
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